

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RAVI CAMPBELL, Individually And On
Behalf Of All Others Similarly Situated,

Plaintiff,

v.

THE BOARD OF TRUSTEES OF
COLUMBIA UNIVERSITY IN THE CITY
OF NEW YORK,

Defendant.

Case No. 1:22-cv-05945-PGG

STUDENT A, individually and on behalf of
others similarly situated,

Plaintiff,

v.

THE BOARD OF TRUSTEES OF
COLUMBIA UNIVERSITY IN THE CITY
OF NEW YORK,

Defendant.

Case No. 1:22-cv-06567-PGG

**JOINT STIPULATION AND ORDER CONSOLIDATING ACTIONS AND
ORDER ESTABLISHING A LEADERSHIP STRUCTURE**

CONSOLIDATION

WHEREAS, there are presently two putative class actions filed as related actions against Defendant The Board of Trustees of Columbia University in the City of New York (“Defendant”) pending in this Court: (1) *Ravi Campbell v. The Board Of Trustees Of Columbia University In The City Of New York*, Case No. 1:22-cv-05945-PGG (the “*Campbell Action*”), and (2) *Student A v. The Board Of Trustees Of Columbia University In The City Of New York*, Case No. 1:22-cv-06567-PGG (the “*Student A Action*,” and together with the “*Campbell Action*,” the “*Actions*”);

WHEREAS, in an effort to promote judicial efficiency and avoid unnecessary duplication of effort, the parties agree that the Actions should be consolidated in this Court;

NOW THEREFORE, the parties, through their undersigned counsel, hereby agree, stipulate, and respectfully request that the Court enter an Order as follows:

1. The following actions are hereby consolidated for all purposes, including pre-trial proceedings and trial, under Case No. 1:22-cv-05945 (the “*Consolidated Action*”), pursuant to Federal Rule of Civil Procedure 42(a):

<u>Case Name</u>	<u>Case Number</u>	<u>Date Filed</u>
<i>Ravi Campbell v. The Board Of Trustees Of Columbia University In The City Of New York</i>	1:22-cv-05945	July 12, 2022
<i>Student A v. The Board of Trustees of Columbia University In the City of New York</i>	1:22-cv-06567	Aug. 2, 2022

2. Every pleading filed in the Consolidated Action, or in any separate action included herein, must bear the following caption:

IN RE: COLUMBIA COLLEGE RANKINGS ACTION	Case No. 1:22-cv-05945-PGG (Consolidated with Case No. 1:22-cv-06567-PGG)
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3. All papers filed in connection with the Consolidated Action will be maintained in one file under Lead Case No. 1:22-cv-05945, and the Clerk shall administratively terminate Case No. 1:22-cv06567-PGG. When the document being filed pertains to all actions, the phrase “All Actions” shall appear immediately after the phrase “This Document Relates To:” and when a pleading applies to some but not all of the actions, the document shall list, immediately after the phrase “This Document Relates To:”, the docket number for each individual action to which the document applies, along with the last name of the first-listed plaintiff in said action.

4. This Stipulation is without prejudice to any and all defenses that Defendant may assert in this or any of the above-referenced actions and without prejudice to any and all claims that the plaintiffs in the Actions (“Plaintiffs”) may assert.

APPOINTMENT OF LEAD COUNSEL

WHEREAS, in order to realize the efficiencies made possible by consolidation of the Actions, Plaintiffs propose that Gainey McKenna & Egleston, whose firm resume is attached hereto as Exhibit A, shall be designated as interim Lead Counsel representing Plaintiffs in the consolidated action, with Eric M. Poulin, Roy T. Willey IV, Paul J. Doolittle, and Blake G. Abbott of the Poulin | Willey | Anastopoulos Law Firm, LLC to file motions to be admitted pro hac vice;¹

WHEREAS, Defendant takes no position on Plaintiffs’ request to appoint interim Lead Counsel;

NOW THEREFORE, Plaintiffs, through their undersigned counsel, hereby respectfully request that the Court enter an Order as follows:

1. Lead Counsel for Plaintiffs for the conduct of the Consolidated Action shall be:

GAINEY McKENNA & EGLESTON

Thomas J. McKenna
Gregory M. Egleston
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Tel: (212) 983-1300
Fax: (212) 983-0383
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Email: gegleston@gme-law.com

2. Lead Counsel shall have the sole authority to speak for Plaintiffs in all matters regarding pre-trial procedure, trial, and settlement negotiations and shall make all work

¹ Thomas J. McKenna of Gainey McKenna & Egleston (tjmckenna@gme-law.com) is the sponsoring attorney and shall be able to appear and file on behalf of Messrs. Poulin, Willey, Doolittle, and Abbott in this action, whose firm resume is attached hereto as Exhibit B.

assignments in such manner as to facilitate the orderly and efficient prosecution of this litigation and to avoid duplicative or unproductive effort.

3. Lead Counsel shall be responsible for coordinating all activities and appearances on behalf of Plaintiffs. No motion, request for discovery, or other pre-trial or trial proceedings will be initiated or filed by any Plaintiffs except through Lead Counsel.

4. Defendant's counsel may rely upon all agreements made with Lead Counsel, or other duly authorized representative of Lead Counsel, and such agreements shall be binding on all Plaintiffs.

Dated: August 24, 2022

Respectfully submitted,

By: /s/ Thomas J. McKenna
Thomas J. McKenna
Gregory M. Egleston
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[Proposed] Lead Counsel for Plaintiffs

-AND-

POULIN | WILLEY| ANASTOPOULO LAW FIRM, LLC
Eric M. Poulin (*Pro Hac Vice forthcoming*)
Roy T. Willey, IV (*Pro Hac Vice forthcoming*)
Paul J. Doolittle (*Pro Hac Vice forthcoming*)
Blake G. Abbott (*Pro Hac Vice forthcoming*)
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Of Counsel

Counsel for Plaintiffs

By: /s/ Maura K. Monaghan

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Counsel for the Board of Trustees of Columbia University

SO ORDERED.

A handwritten signature in black ink, reading "Paul G. Gardephe", written over a horizontal line.

Paul G. Gardephe

United States District Judge

Dated: September 8, 2022